

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
25-CR-20213-ALTMAN/LETT

CASE NO. _____

18 U.S.C. §§ 2252(a)(1) and (b)(1)

18 U.S.C. §§ 2252(a)(4)(B) and (b)(2)

18 U.S.C. § 2253

UNITED STATES OF AMERICA

v.

MICHAEL WILLIAM CILETTI,

Defendant.



INDICTMENT

The Grand Jury charges that:

COUNT 1

Transportation of Material Involving the Sexual Exploitation of Minors
(18 U.S.C. §§ 2252(a)(1) and (b)(1))

On or about January 4, 2025, in Miami-Dade County, in the Southern District of Florida,
and elsewhere, the defendant,

MICHAEL WILLIAM CILETTI,

did knowingly transport and ship any visual depiction, using any means and facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depiction was of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).

[REMAINDER INTENTIONALLY LEFT BLANK]

COUNT 2
Possession of Material Involving the Sexual Exploitation of Minors
(18 U.S.C. §§ 2252(a)(4)(B) and (b)(2))

From in or around March 2020, to in or around January 2025, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

MICHAEL WILLIAM CILETTI,

did knowingly possess matter which contained any visual depiction that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which was produced using materials which had been so shipped and transported, by any means, including by computer, and the production of such visual depiction having involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depiction was of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

Pursuant to Title 18, United States Code, Section 2252(b)(2), it is further alleged that such visual depiction involved a prepubescent minor and a minor who had not yet attained twelve years of age.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **MICHAEL WILLIAM CILETTI**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 2252, as alleged in this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections

2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;


b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and


c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

All pursuant to Title 18, United States Code, Section 2253(a) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

FOREPERSON


HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY


ALMAS ABDULLA
ASSISTANT UNITED STATES ATTORNEY